ESTTA Tracking number:

ESTTA541351 06/03/2013

Filing date:

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91206463		
Party	Defendant RICH C. YOUNG		
Correspondence Address	RICH C YOUNG 333 WEST GARVEY AVE , SUITE 806 ROSEMEAD, CA 91754 UNITED STATES rcy2001@gmail.com		
Submission	Other Motions/Papers		
Filer's Name	/Rich C. Young/		
Filer's e-mail	rcy2001@gmail.com		
Signature	/Rich C. Young/		
Date	06/03/2013		
Attachments	TRADE_Opp 91206463 BHPC Opp Initial Disclosure 06-01-13.pdf(229429 bytes )		

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

BHPC ASSOCIAT	ES LLC,	_ } }	
	Opposer	} }	
v/s		}	Opposition No. 91206463
		} }	Serial No. 85477199
YOUNG, RICH C.		} }	
	Applicant	} } }	

## **RESPONSE TO OPPOSER'S INITIAL DISCOLOSURES**

Pursuant to Fed. R. Civil. P. 26 (a) (1) Applicant, Rich C. Young, hereby provides the following initial disclosures:

(i) Applicant, Rich C. Young have discoverable information:

The Applicant have been provides the discoverable information are not use of the mark BEVERLY HILLS POLO CLUB and the mark BEVERLY HILLS POLO CLUB & Polo Player Design in conjunction with the marketing and sale of products including clothing by Opposer and by Opposer's licensees:

> David Haddad & Michael Haddad BHPC Associates LLC 1370 Broadway New York, NY 10018

(ii) Description of all documents that Opposer has in its possession, custody or control and may use to its claim:

Applicant agreed that Opposer has all documents relating to the registration and licensing of the mark BEVERLY HILLS POLO CLUB and the mark BEVERLY HILLS POLO CLUB & Polo Player Design, and to the marketing and sale of products, including clothing, in conjunction with those trademarks.

Those documents are located at BHPC Associates LLC's offices at 1370 Broadway, New York, NY 10018.

- (iii) Computation of each category of damages: Not Applicable.
- (iv) Any insurance agreement: None

Dated: 1 June 2013 Respectfully submitted,

\_\_\_\_\_Rich C. Young\_\_\_\_

Rich C. Young 333 W. Garvey Ave, Suite 806 Monterey Park, CA 91754

Tel: 626-289-8822

Email: rcy2001@gmail.com

## **CERTIFICATE OF MAILING**

I hereby certify that a true and completed copy of the foregoing Response Opposer's Initial Disclosures was by First Class Mail, with sufficient postage prepaid, on this 1 June 2013.

Dated: 1 June 2013 Robert L. Epstein

EPSTEIN DRANGEL LLP

60 East 42<sup>nd</sup> Street, Suite 2410

New York, NY 10165

By: \_\_\_\_\_/RICH C. YOUNG/\_\_\_\_\_

Rich C. Young

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